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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff

vs.

**CHEN CHIANG LIU
(a.k.a. "Wilson Liu"),**

**MIN LI LIU,
(a.k.a. "Teresa Liu"),**

Defendants

CRIMINAL COMPLAINT

Magistrate No. _ 2:07-mj-480-GWF

Violations:

18 U.S.C. § 472 - passing counterfeit securities

I, the undersigned complainant being duly sworn before a United States Magistrate Judge of the District of Nevada, state the following is true and correct to the best of my knowledge and belief.

I. CRIMINAL VIOLATIONS

1. On or about July 29-30, 2007, in the State and Federal District of Nevada and elsewhere within the jurisdiction of this Court,

**CHEN CHIANG LIU and
MIN LI LIU,**

the defendants herein, aiding and abetting one another and others, with intent to defraud, passed, attempted to pass, possessed and concealed falsely made, forged and counterfeited obligations of the United States, that is, more than four hundred (400) Federal Reserve Notes in the denomination of one hundred dollars, which the defendants then knew to be falsely made, forged and counterfeited, in violation of Title 18, United States Code, Section 472.

II. STATEMENT OF FACTS

1. Complainant is a Special Agent of the United States Secret Service presently assigned to the Las Vegas Field Office. Complainant's duties as a Secret Service agent include the investigation of acts of fraud with regard to counterfeit U.S. currency.
2. Your complainant is one of several agents participating in an investigation regarding counterfeit U.S. currency that has been uttered in casinos in Nevada. This investigation has revealed that suspects, known and unknown are trafficking in and uttering extremely high quality counterfeit U.S. currency, specifically counterfeit \$100 Federal Reserve Notes (FRN), for the purpose of laundering the counterfeit using slot machines. Due to the high quality of this counterfeit, cash validators used in casino slot machines do not detect the counterfeit \$100 Federal Reserve Notes.
3. The United States Secret Service categorizes all counterfeit and assigns "circular numbers" to counterfeit U.S. currency which has been manufactured using a traditional printing press process. The circular number for the counterfeit U.S. currency in this investigation is "C-22500". The defendants and other suspects known and unknown have uttered counterfeit U.S. currency to fraudulently effect financial transactions using slot machines over the time period from April 2007 through July 24, 2007 for the purposes of obtaining more than \$80,000.00 in genuine U.S. currency. During this span, agents of the United States Secret Service have recovered a total of \$86,100.00 in counterfeit \$100 Federal Reserve Notes, specifically circular number C-22500, from casinos and businesses in Las Vegas, Nevada.

- 1 4. On July 29, 2007, the Las Vegas Field Office received seven (7) counterfeit \$100 Federal
2 Reserve Notes circular number C-22500, from Caesar's Palace which had been discovered
3 by the casino counters in slot machine drops.
- 4 5. On July 30, 2007, your complainant was contacted by Tom Flynn, Vice President of
5 Surveillance, Caesar's Palace. Flynn reported that Caesar's Palace had identified thirteen
6 slot machines that had been compromised with an aggregate number of sixty (60)
7 counterfeit \$100 Federal Reserve Notes. Flynn further explained that research of slot
8 machine reports and corresponding surveillance video had rendered one subject who was
9 seen on video playing twelve of the thirteen identified slot machines. The subject on video
10 was playing slots using his Total Rewards card #750011606. Flynn then was able to
11 identify the suspect using the information for that rewards card. Flynn advised the suspects
12 name was CHEN CHIANG LIU.
- 13 6. On July 30, 2007, your complainant and other agents of The United States Secret Service
14 responded to Caesars' Palace. While enroute to Caesar's Palace your complainant spoke to
15 Mike Cicio, Surveillance Supervisor, Caesar's Palace, who advised that Caesar's Palace
16 Security detained CHEN CHIANG LIU, and his wife, MIN LI LIU, on suspicion of uttering
17 counterfeit \$100 Federal Reserve Notes. According to Cicio, both suspects had been
18 preparing to depart the property in a white Sport Utility Vehicle, California Tag #5SEV597.
- 19 7. On July 30, 2007, Special Agent Michael Adams, met with Merry Carroll Dewey, Cage
20 Supervisor, Caesar's Palace, and subsequently recovered and verified seventy (70)
21 counterfeit \$100 Federal Reserve Notes, circular number C-22500. When Special Agent
22 Adams was given the counterfeit by Dewey the notes were all stapled to "Caesar's Palace
23 24 25 26

1 Soft Count Counterfeit Bills Exception Reports". All the notes were separated on these
2 reports based on the specific slot drop or location they were discovered in. Special Agent
3 Adams was also supplied with a printout sheet listing thirteen slot machines with play
4 under CHEN CHIANG LIU'S player rewards card number 7500116006. Upon comparing
5 the slot report with supplied Exception Reports, it was determined that the total number of
6 \$100 Federal Reserve Notes read by the validators, placed into the slot machine by CHEN
7 CHIANG LIU and/or MIN LI LIU (who held a duplicate players card with number
8 7500116006) was sixty four(64). The total number of verified counterfeit \$100 Federal
9 Reserve Notes, Circular Number C-22500, discovered in the same slot machines was sixty
10 (60). Therefore, these reports corroborate security personnel's observations and support
11 the inference that all but four (4) of the one hundred dollar (\$100) Federal Reserve Notes
12 placed into the listed slot machines by CHEN CHIANG LIU or MIN LI LIU were
13 counterfeit.
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16 8. On July 30, 2007, your complainant advised CHEN CHIANG LIU of his rights in
17 accordance with *Miranda*, which CHEN CHIANG LIU advised he understood and was
18 willing to waive and answer questions. CHEN CHIANG LIU advised that he had no idea
19 that the money he had uttered in slot machines was counterfeit. Your complainant then
20 asked if CHEN CHIANG LIU would empty his pockets so your complainant could verify
21 any currency CHEN CHIANG LIU had in his possession. CHEN CHIANG LIU produced a
22 total of nine (9) \$100 Federal Reserve Notes. Two (2) of which were verified by your
23 complainant to be counterfeit \$100 Federal Reserve Notes, Circular number C-22500. Your
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1 complainant also asked if CHEN CHIANG LIU went by any other names, he advised he is
2 also known as WILSON LIU.

3 9. On July 30, 2007, part way through the interview of CHEN CHIANG LIU, your
4 complainant contacted Special Agent Mike Kim, United States Secret Service, Los Angeles
5 Field Office, regarding CHEN CHIANG LIU, to inquire if Special Agent Kim, who had
6 conducted an investigation into these specific counterfeit \$100 Federal Reserve Notes, was
7 familiar with CHEN CHIANG LIU. Special Agent Kim advised that CHEN CHIANG LIU
8 is currently pending trial for having been in possession of counterfeit \$100 Federal Reserve
9 Notes, specifically Circular number C-22500, and had been placed on conditional pretrial
10 release pending his trial in that district.

11 10. On July 30, 2007, after speaking with Special Agent Kim, your complainant continued the
12 interview with CHEN CHIANG LIU. CHEN CHIANG LIU told your complainant that he
13 was owed money by two associates whom he only knows as "Mr. Cheng" and "Mr. Kim".
14 According to CHEN CHIANG LIU, he was recently paid \$30,000.00 as payback for a debt
15 that he would not verify. CHEN CHIANG LIU would not say who specifically paid him
16 \$30,000.00 nor would he say why, exactly, these subjects owed him money. CHEN
17 CHIANG LIU did state that he was afraid some of the money he had received was
18 counterfeit. Your complainant then asked where the \$30,000.00 was at this point in time
19 and CHEN CHIANG LIU was reluctant to say but suggested that it was at his home in
20 Southern California. Your complainant then asked CHEN CHIANG LIU about his pending
21 trial date in California. CHEN CHIANG LIU told your complainant that the charges were
22 dropped and that it was all a misunderstanding. Your complainant told CHEN CHIANG
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1 LIU what he was told by Special Agent Kim, at which time CHEN CHIANG LIU told your
2 complainant to allow him to return home and he would collect the \$30,000.00 and take it to
3 Special Agent Kim. CHEN CHIANG LIU further stated that he would be able to purchase
4 very large quantities of counterfeit \$100 Federal Reserve Notes. CHEN CHIANG LIU also
5 told your complainant that fearing the \$30,000.00 he received from "Mr Kim" and "Mr
6 Cheng" might be counterfeit, he requested they write down the serial numbers of all the
7 Federal Reserve Notes they paid him with so if he was ever accused of passing counterfeit
8 Federal Reserve Notes, he would have a list of serial numbers to present as proof he
9 received the notes from a third party. However CHEN CHIANG LIU could not produce the
10 alleged list.
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13 **11.** On July 30, 2007, while your complainant was interviewing CHEN CHIANG LIU, Special
14 Agent Taurus Glover and Special Agent Daniel Kircher obtained a signed Consent to
15 Search Form from CHEN CHIANG LIU's wife MIN LI LIU for their white Cadillac
16 Escalade, California License Plate 5SEV597. Special Agents Glover and Kircher read the
17 Consent to Search form to MIN LI LIU through translator Xin Dai, an employee at Caesar's
18 Palace.
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20 **12.** On July 30, 2007, Special Agent Glover and Special Agent Kircher conducted a consent
21 search of CHEN CHIANG LIU'S and MIN LI LIU'S white Cadillac Escalade, California
22 Tag 5SEV597. During this search they discovered three red envelopes containing a total
23 of three hundred and one (301) counterfeit \$100 Federal Reserve Notes, Circular number
24 C-22500. The three envelopes were found concealed in a red shopping bag, beneath clothes
25 and other personal items.
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1 13. On July 30, 2007, after being advised of the counterfeit discovered in the vehicle, your
2 complainant asked CHEN CHIANG LIU why he did not mention the money concealed in
3 his vehicle. CHEN CHIANG LIU advised that the counterfeit was the \$30,100.00 given to
4 him as payment for a debt and that is the money he was going to take to Special Agent Kim
5 if your complainant would release him. Your complainant then asked CHEN CHIANG LIU
6 why he did not tell your complainant about the money so that your complainant could
7 verify whether the money was counterfeit; CHEN CHIANG LIU offered no answer to this
8 question.
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10 14. On July 30, 2007, your complainant interviewed MIN LI LIU. Prior to the interview your
11 complainant advised MIN LI LIU of her rights under Miranda which your complainant read
12 and had translated to MIN LI LIU by Xin Dai, a Caesar's Palace employee. MIN LI LIU
13 advised that she understood her rights and was willing to waive them to answer questions.
14 MIN LI LIU told your complainant and Special Agent Dan Kircher, that she was unaware
15 that any of the money was counterfeit. MIN LI LIU also stated she did not know anything
16 about the counterfeit currency found subsequent to the consent search of her vehicle. MIN
17 LI LIU did admit however to packing the shopping bag and stated she placed all the
18 clothing and personal items in the bag. One of the red envelopes that contained counterfeit
19 concealed in the shopping bag found in the vehicle had writing on it. When asked who's
20 handwriting it was, MIN LI LIU stated it was hers.
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22 15. Upon searching MIN LI LIU's purse, \$23,800.00 in genuine U.S. Currency was found in a
23 make up bag along with an empty red envelope which was similar to the red envelopes the
24 counterfeit currency was found stored in the vehicle. Also in her purse inside a wallet was
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1 an additional \$2,900.00 in genuine U.S Currency consisting of \$100, \$50, \$20, \$5, and \$1
2 Federal Reserve Notes. When asked why she was carrying an aggregate sum of \$26,710.00
3 in genuine currency MIN LI LIU stated it was from game winnings, however MIN LI LIU
4 would not be specific about where or when the winnings occurred. Also found in her purse
5 was a duplicate players card number 7500116006 in the name of CHEN CHIANG LIU.
6 According to MIN LI LIU she has a duplicate card from her husband's account she uses
7 when she is playing slot machines. MIN LI LIU also had several players cards from other
8 casinos in Las Vegas, Nevada, several in the name of WILSON C. LIU, and CHEN
9 CHIANG WILSON. Lastly, nine "Slot Jackpot/Fill Request/W2G Receipts" were found in
10 MIN LI LIU's purse. The receipts had been for winnings at Caesar's Palace dating from
11 July 26 - 30, 2007. The total amount of winnings documented for that period of time was
12 \$17,600.00.
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- 15 16. The high quality counterfeit one hundred dollar (\$100) Federal Reserve Notes, Circular
16 number C-22500, recovered from Caesar's Palace and from the defendants on July 30,
17 2007, brings the aggregate recovered in casinos and businesses in Las Vegas, Nevada, since
18 April 24, 2007, to \$123,400.00 in these distinctive counterfeit notes.
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- 20 17. The investigation in this case is ongoing, and the foregoing summary does not include
21 every aspect of this continuing investigation nor every act that has been or will be
22 discovered. Nonetheless, the complainant respectfully submits that the foregoing synopsis
23 establishes probable cause to believe that the defendants, aiding and abetting one another,
24 knowingly and with intent to defraud, passed, uttered, attempted to pass or utter, and
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1 possessed and concealed falsely made, forged and counterfeited Federal Reserve Notes in
2 violation of Title 18, United States Code, Section 472.
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8 CRAIG A. DUMAIS
9 Special Agent
10 United States Secret Service

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12 SUBSCRIBED AND SWORN to before me this 31st day of July 2007.
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16 UNITED STATES MAGISTRATE JUDGE
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